

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DANYAL SHAIKH,
Plaintiff,

v.

TEXAS A&M UNIVERSITY
COLLEGE OF MEDICINE and
MICHAEL K. YOUNG.
Defendants.

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Civil Action No. 4:16-CV-00591

PLAINTIFF'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY TO
DEFENDANT'S MOTION TO DISMISS

NOW COMES Danyal Shaikh ("Plaintiff"), by and through his attorneys of record, Don Henslee, of the Law Offices of Donald G. Henslee, and Martin Cirkiel, of Cirkiel & Associates, P.C., who files this *Plaintiff's Unopposed Motion for Extension of Time to file Reply*, and in support thereof, respectfully shows the following:

1. Martin Cirkiel, of Cirkiel & Associates, P.C., has just been brought in as co-counsel, having filed his *Notice of Appearance* on behalf of Plaintiff in this case on April 28, 2016.
2. Plaintiff's *Reply* to Defendant's *Motion to Dismiss* is due on April 29, 2016.
3. At present, Plaintiff's Counsel Martin Cirkiel is taking the lead in this case as Don Henslee had emergency surgery on April 27th and will not return to work until the following week.
4. On April 28th Mr. Cirkiel is in a full-day mediation in Round Rock, Texas, and he currently has to file a *Reply* to a *Motion to Dismiss* in the Western District of Oklahoma April 29th in Aikins, Cause No. CV-2015-00603-W.
5. Additionally, Mr. Cirkiel has until April 29th to file a *Reply* to a *Motion to Dismiss* in the

Southern District of Texas in Douglas, Cause No. 4:16-CV-134.

6. Furthermore, while Mr. Cirkiel normally works on Fridays, he is planning to observe Passover on the 29th with his family.

7. Given his current personal and professional demands as well as co-counsel Don Henslee's medical concerns, Counsel for Plaintiff reasonably believes he will be able to fully familiarize himself with the case in order to adequately finalize Plaintiff's *Reply* if given a one (1) week extension.

8. As such, Plaintiff requests an extension of time in which to file his Brief until May 6, 2016.

9. Plaintiff's Counsel has contacted Counsel for Defendant by email and they are UNOPPOSED to this Motion.

10. This Motion for Extension of Time is not made for purposes of delay but so that justice may be done.

Respectfully submitted,

Cirkiel & Associates, P.C.

/s/ Martin J. Cirkiel
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that on April 27, 2016, I conferred with Eric Hudson, Counsel for Defendant, who is UNOPPOSED with this motion and the proposed order.

/s/ Martin J. Cirkie
Martin J. Cirkie

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been forwarded to the following parties on this 28th day of April, 2016 by Notice of Electronic Filing from the Clerk of the Court.

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/s/ Martin J. Cirkiel
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